IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AMERICAN COUNCIL OF LEARNED
SOCIETIES, et al.,

         Plaintiffs,
         v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment of the Humanities, et al.,

         Defendants.

Case No. 1:25-cv-03657

DECLARATION OF LAUREN TILTON

1.   I, Lauren Tilton, am the E. Claiborne Robins Professor of Liberal Arts and Professor of Digital Humanities in the Department of Rhetoric and Communications at the University of Richmond.

2.   My research focuses on analyzing, developing, and applying digital and computational methods to the study of 20th and 21st century documentary expression and visual culture.

3.   I am a member of the American Historical Association.

4.   I have received several NEH grants. PGVis builds on an NEH grant titled Photogrammar Project (HD-51421-11) to Yale University in 2011 to turn Photogrammar into generalizable software, following a decade of requests from cultural institutions and researchers to create their own Photogrammar. CLAAI was intended to build on University of Richmond's strength in Visual AI, which is largely due to the Distant Viewing Lab. My DVLab received an

1

NEH grant titled Distant Viewing Toolkit (DVT) for the Cultural Analysis of Moving Images to develop the Distant Viewing Toolkit for applying AI to moving images (HAA-261239-18).

5.   As of April 2025, I was working under two NEH grants. The first, entitled PGVis: Digital Public Humanities Software for Visualizing Image Collections (HAA-284853-22) ("PGVis"), was a $324,693 award that I received in 2022 to create software that would easily allow non-programmers to develop interactive public humanities digital projects.

6.   PGVis will be open-source platform that enables museums, libraries, archives, and community groups to publish their digitized photographs, maps, and manuscripts as interactive maps and timelines—without licensing fees or programming expertise. The grant included developing collaborations with researchers and institutions for case studies, researching cutting-edge technologies, making sure we are following best practices in open source, open access software, and identifying large amounts of data. We also created two advisory boards. One is the Case Study Advisory Board, and the other is the Technical Advisory Board to make sure we incorporated best practices in software development for DH. We also collaborated with university staff to develop the budget and follow all NEH guidelines. The grant took several months to develop into a full proposal and submit.

7.   I had been working on this project for three years and anticipated completing it later this year.

8.   Since the grant award, we have been working to develop PGVis into generalizable, easy to use, open-source software. We continued our research on best practices in software design to make sure the software was light weight and would work across platforms. Following best practices in software development, we created a prototype and tested with two case studies, which included producing and organizing large amounts of data. We solicited

feedback on the case studies to identify areas for improvement with the software, which we were planning to finish over the next several months along with documentation for how to use the software for the public. The NEH funds have been particularly important for supporting our time to work on the grant.

9.   On [December 27, 2024] I received a notification that I was awarded another NEH grant (RAI-301501-25). This second grant was for $491,863 to establish a humanities research center on the social, cultural, and legal dimensions of artificial intelligence, with a focus on visual AI.

10.   The grant included matching funds. The NEH would match up to $222,602. We were in the process of beginning to raise $226,602 to match.

11.   CLAAI grant was expected to commence in August 2025 CLAAI is to be led by University of Richmond and is a partnership with the Associated Colleges of the South ("ACS") and its 15 university members. I had finalized and began inviting members to the board, including setting up a process with ACS for soliciting membership nominations from the ACS for board seats. I had also been finalizing the process for how faculty across the ACS schools could apply for our Research Fellowships with an application about to be sent to ACS. For our Course Development and Transformation Grants, I had been working with experts in the University of Richmond's Faculty Hub. To support the Workshop and Lecture Series, I had been meeting with key stakeholders at the University of Richmond such as our Center for Civic Engagement ("CCE"), Faculty Hub, and Creativity, Innovation and Entrepreneurship ("CIE") to work together to host lectures and talks. I had also been working with our CIE to start connecting with City of Richmond AI initiatives in preparation for our RVAi Initiative to launch in fall 2026.

12.   Through this grant, I anticipated launching the CLAAI in the August of 2025. We

were planning to bring together researchers, students, and pedagogy experts working within

small liberal arts colleges to study the social, cultural, and legal possibilities and challenges of

AI. We would develop collaborative research through Research Fellowships, expand course

offerings on the ethical issues that arise within AI and ways we can use AI to address pressing

social issues through Course Transformation and Professional Development Grants, expand

access to AI methods through in-person and digital workshops and talks, and support knowledge

sharing and creation within and beyond the University of Richmond by building on our strength

in Visual AI.

13.   On April 2, 2025, I received two nearly identical emails from

Grant_Notifications@NEHemail.onmicrosoft.com informing me that my grants were being

terminated.

14.   The notifications did not include my name, or any information about my grants.

They appeared to be copies of a form letter.

15.   The notifications did not include any specific information about why the grants

were terminated or how to appeal the decisions.

16.   We have stopped developing PGVis because I do not have the grant funds to

support the final steps in developing the software. The main developer on the project is now

focusing on projects that come with compensation. As a result, we will not be able to make

accessible to researchers, cultural heritage institutions including libraries and museums, and the

public-at-large open access, open-source software. We also are not able to follow through on

developing the additional projects with our partners as we outlined in the grant. For CLAAI, we

are in the process of redesigning the center because we do not have the grant funds to support our

core activities: Research Fellowships, Course Transformation and Professional Development Grants, or honorariums and travel for speakers. We are having to significantly scale down CLAAI, particularly the opportunities for our 14 partner schools in ACS. We also must scale down our efforts to support the city of Richmond with the development of RVAi as we restructure and work to raise funds to support CLAAI. University of Richmond, the city, statem and region were posed to learn at scale from each other across the south, but now we must substantially scale down our efforts. All of this also means that I need to spend time helping raise additional funds, including write additional grants, rather than conduct the research and build CLAAI that are a part of making the city, region and nation a leader in AI.

17.   As a result of these terminations, I am adversely affected in multiple ways. One is that I am pausing a three-year research agenda and have no final product, which is a key part of my job and a part of my assessment for merit pay. I have lost a significant amount of salary, which has impacted my financial well-being. I also passed on potential job opportunities at more prestigious and international universities because I had success with raising NEH funds. NEH funds are an important and powerful source of money and prestige. Because they are so difficult to receive, they are considered a significant development in a person's career and reputation. Without an agency like NEH, pursuing a career in another country is more appealing where they have significant funding for the humanities. Because I had two NEH grants, I was not interested in a career outside of the US. If I had not had them, I would have pursued the opportunities beyond the US where there is prestigious federal humanities funding. I also did not apply to other jobs in the US, particularly a very prestigious job where I was contacted by a search firm, because I was charge of developing CLAAI and committed to developing the ACS collaboration and supporting the American South, including my home state of Louisiana. In academia, the

prestige of the institution is very important, including opportunities for major fellowships that are

not available at smaller institutions. I passed on career opportunities because of our NEH grants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 13, 2025 in [Paris, France].

Lauren C Tilton

Name Lauren Tilton
Role Professor
Organization University of Richmond